

From: Arnold Whitridge
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To: Dabbs, Paul
Subject: North Coast comment

**Comments on June 7 draft of North Coast Regional Report
Arnold Whitridge, July 1, 2004**

Small and large improvements seem necessary in the North Coast report and the Volume 1 summary.

It doesn't seem reasonable to open the State of the Region section with "The North Coast Region generally has good water quality that adequately supports the beneficial uses of its water bodies", when most major rivers with the exception of the Smith have State-recognized water quality impairments that by definition interfere with beneficial uses. Some of these impairments are noted later in the same section, but the coverage seems incomplete and peculiarly selective. The region's largest river is officially impaired by nutrients; isn't it appropriate to mention this in State of the Region? Why mention that "The Eel, Mad, and Trinity Rivers, as well as the Garcia River and Redwood Creek, suffer from sedimentation...", when the problem exists in most other rivers too? The entire Russian River watershed is on the 303(d) list for sediment impairment, and surely the Russian is more interesting to more readers than the Garcia.

It's true that "fisheries in the region can be adversely affected by a number of water quality factors", but how fisheries are in fact affected seems more pertinent in a State of the Region report than how they "can be".

As I've commented before, the Eel-to-Russian diversion seems sufficiently significant and controversial to merit discussion in State of the Region and/or Looking to the Future.

The language about the Trinity in the third paragraph of Water Supply and Use is not quite right. Additional releases to the Trinity depend not on the results of an "ongoing flow study" (the flow study was finalized in 1999), but rather on results of litigation over a 2000 EIS/R and associated Record of Decision. The language in State of the Region (p. 4) is better, and could be borrowed or at least consulted. In the same 3rd paragraph of Water Supply, the word "protests" should be "protects".

In Setting and again in Land Use, the draft says that the region includes 400 miles of coastline. Perhaps this is one defensible measurement of an irregular feature, but it doesn't seem the most appropriate one to use in B-160, where readers will be trying to understand the extent and relative sizes of the regions. Consider: the North Lahontan region has a slightly longer, roughly parallel extent

that is described as 270 miles.

The Land Use section says that the region has 264,500 irrigated acres (year unspecified), but the table in Figure 2-1 gives a 2000 total of 326,600 acres. I recommend using one consistent acreage number.

The Looking to the Future section and the Volume 1 summary seem remarkably uninformative in their complete neglect of TMDLs, tribal rights, FERC relicensing processes, and other forces that are shaping and will continue to shape water management in the region.